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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re: :
: **Chapter 11**
: **Case No. 05-17930 (ALG)**
:
:
NORTHWEST AIRLINES CORPORATION, et al.,:
:
: **(Jointly Administered)**
:
Debtors. :
:
-----X

**DESIGNATION OF ITEMS TO BE INCLUDED IN RECORD ON APPEAL AND
STATEMENT OF ISSUES PRESENTED**

Pursuant to Bankruptcy Rule 8006, Appellant the Association of Flight Attendants – CWA, AFL-CIO (“AFA”) hereby submits its designation of items to be included in the record on appeal of the Bankruptcy Court’s April 24, 2007 Order granting Debtors’

Motion to Disallow and Expunge Claims Numbered 11283 and 11295, as well as a statement of the issues to be presented on appeal.

DESIGNATION OF ITEMS TO BE INCLUDED IN RECORD ON APPEAL

AFA designates the following items to be included in the record on appeal:

1. Memorandum of Opinion Regarding Debtors' Section 1113 Application, dated June 29, 2006 (Docket No. 2962);
2. Order Authorizing Rejection of Debtors' Collective Bargaining Agreement, dated July 5, 2006 (Docket No. 2998);
3. AFA's Proof of Claim Numbered 11283, dated August 16, 2006;
4. AFA's Proof of Claim Numbered 11295, dated August 16, 2006;
5. Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA with Notice of Objection and Proposed Order, dated January 18, 2007 (Docket No. 4557);
6. Debtors' Memorandum of Law in Support of Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA, dated January 18, 2007 (Docket No. 4559);
7. Air Line Pilots Association's Response to Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA, dated February 20, 2007 (Docket No. 4928);
8. AFA's Memorandum of Law in Opposition to Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA, dated February 20, 2007 (Docket No. 4932);

9. Joinder and Statement of the Official Committee of Unsecured Creditors in Support of Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA, dated March 19, 2007 (Docket No. 5379);

10. Debtors' Reply Brief in Support of Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 1295 Filed by AFA, dated March 20, 2007 (Docket No. 5407);

11. Transcript of Hearing Held on March 21, 2007 at 2:41 PM Regarding Debtors' Tier III (B) Objection to Proofs of Claim Numbered 11283 and 11295, etc., dated March 21, 2007 (Docket No. 5738);

12. Air Line Pilots Association's Response to Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA, dated April 5, 2007 (Docket No. 5831);

13. AFA's Supplemental Memorandum of Law in Support of Motion for Relief from the Judgment and Order Authorizing Rejection and in Opposition to Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 with Certificate of Service, dated April 5, 2007 (Docket No. 5837);

14. The Official Committee Of Unsecured Creditors' Supplemental Brief in Support Of Debtors' Tier III (B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA, dated April 5, 2007 (Docket No. 5838);

15. Debtors' Supplemental Brief in Support of Debtors' Tier III(B) Objection to Proofs of Claim Numbered 11283 and 11295 Filed by AFA and in Opposition to AFA's Motion for Relief from the Judgment and Order Authorizing Debtors to Reject

Their Collective Bargaining Agreement Covering Flight Attendants, dated April 5, 2007 (Docket No. 5839);

16. Memorandum of Opinion Regarding AFA's Motion for Relief and Debtors' Claim Objection, dated April 13, 2007 (Docket No. 6055); and

17. Order Expunging Claims Numbered 11283 and 11295 Filed by AFA, dated April 24, 2007 (Docket No. 6412).

STATEMENT OF ISSUES PRESENTED ON APPEAL

1. Whether the Bankruptcy Court erred in holding that AFA does not have a claim for damages arising out of the interim modifications imposed by the Court pursuant to 11 U.S.C. § 1113(e).

2. Whether the Bankruptcy Court erred in holding that AFA does not have a claim for damages arising out of the rejection of its collective bargaining agreement pursuant to 11 U.S.C. § 1113(c) and imposition of the terms of Debtors' March 1, 2006 proposal.

Respectfully submitted,

/s/ Robert S. Clayman
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Dated: New York, New York
May 3, 2007

CERTIFICATE OF SERVICE

I, Robert S. Clayman, declare that on this 3rd day of May, 2007, a true and correct copy of the foregoing Designation of Items to be Included in Record on Appeal and Statement of Issues Presented was served by electronic mail upon the following:

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Dated: May 3, 2007